

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

---

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Honorable Karen M.  
Williams,  
Magistrate Judge

**THE ZHP PARTIES' MOTION FOR PROTECTIVE ORDER  
PRECLUDING DEPOSITIONS OF CERTAIN EMPLOYEES**

Zhejiang Huahai Pharmaceutical Co., Ltd, Huahai US, Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC (collectively the “ZHP Parties”), pursuant to this Court’s January 11, 2021 Order (Dkt. No. 727), file this Motion for Protective Order and aver as follows:

1. In support of the instant motion, the ZHP Parties will rely on their accompanying brief, exhibits, and proposed order.

January 20, 2021

Respectfully submitted,

By: /s/ Seth A. Goldberg

DUANE MORRIS LLP  
Seth A. Goldberg  
30 South 17th Street

Philadelphia, Pennsylvania 19103  
Tel.: (215)979-1000  
Fax: (215) 979-1020  
SAGoldberg@duanemorris.com

*Attorneys for Zhejiang Huahai  
Pharmaceutical Co, Ltd., Huahai  
U.S., Inc., Princeton Pharmaceutical  
Inc., and Solco Healthcare US, LLC*